

OFFICE OF THE MONITOR  
*NUNEZ, ET AL. V. CITY OF NEW YORK, ET AL.*

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March 3, 2016

**Via ECF**

The Honorable Laura T. Swain  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10006

*Re: Nunez, et al. v. City of New York, et al., 11-cv-5845 (LTS) (JCF)*

Dear Judge Swain:

We write to respectfully request that the Court grant a modification to the Consent Judgment (Dkt. No. 249) to lengthen each of the second and third reporting periods by one additional month, changing the reporting periods from four months to five months. Attached is a document that identifies, in track changes, the proposed modification to the relevant section of the Consent Judgment, Section XIX (Reporting Requirements and Parties' Right of Access), ¶1. The requested modification to the Consent Judgment will not alter the first reporting period or the delivery of the Monitor's first report on May 31, 2016. We respectfully make this request because we believe an additional month in the second and third reporting periods is necessary to allow the Monitoring Team to adequately and appropriately conduct the duties and responsibilities required under the Consent Judgment. We have discussed the proposed modification to the Consent Judgment with the parties and they have no objections.

Please do not hesitate to contact us if you have any questions or require further information on the proposed modification.

Sincerely,

s/ Steve J. Martin  
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Steve J. Martin, Monitor  
Anna E. Friedberg, Deputy Monitor

**Proposed Modification to Consent Judgment**

**XIX. REPORTING REQUIREMENTS AND PARTIES' RIGHT OF ACCESS**

1. The Department shall submit periodic compliance reports to the Monitor and Plaintiffs' Counsel ("Compliance Reports"). The Compliance Reports shall be provided to the Monitor and Plaintiffs' Counsel within 30 days after the end of each Reporting Period during the Agreement. The first Reporting Period shall begin on the Effective Date and end four months after the Effective Date. ~~For the first year after the Effective Date, each subsequent Reporting Period shall be a four~~ The second and third Reporting Periods shall be a five month period of time beginning on the day following the end of the previous Reporting Period. Thereafter, the length of the Reporting Period shall be a six-month period of time beginning on the day following the end of the previous Reporting Period.